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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

15M 848

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a) and 960)

CLEVELAND CHARLES,

Defendant.

-X

EASTERN DISTRICT OF NEW YORK, SS:

SCOTT SALAMON, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (“HSI”), duly appointed according to law and acting as such.

On or about September 5, 2015, within the Eastern District of New York and elsewhere, the defendant CLEVELAND CHARLES, did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960)

The source of your deponent's information and belief are as follows:¹

1. On or about September 5, 2015, the defendant CLEVELAND CHARLES, a citizen of Guyana, arrived at John F. Kennedy International Airport (“JFK”) in Queens, New York aboard Caribbean Airlines Flight 524 from Georgetown, Guyana.

¹ Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

2. The defendant was selected for a Customs and Border Protection (“CBP”) examination. The defendant presented a black “Airliner” suitcase for inspection.

3. A search of the black “Airliner” suitcase revealed that it contained, among other things, one bottle purporting to contain rum and which appeared to have been purchased from a “duty free” shop. The defendant stated, in sum and substance and in part, that the bottle had been purchased at the airport in Guyana before the flight.

4. A CBP officer then opened the bottle, which contained a thick syrup-like substance with a strong odor that appeared inconsistent with rum.

5. The substance contained in the bottle field-tested positive for cocaine. The defendant CLEVELAND CHARLES was then placed under arrest.

6. The gross weight of the bottle containing cocaine recovered from the defendant was approximately 1.48 kilograms.

WHEREFORE, your deponent respectfully requests that the defendant CLEVELAND CHARLES be dealt with according to law.

Dated: Brooklyn, New York
September 6, 2015



SCOTT SALAMON
Special Agent
United States Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
6th day of September, 2015

THE HONORABLE VIKTOR V. BOHORELSKY
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK